

Údarás Rialála
Cearrbhachais
na hÉireann

Gambling
Regulatory
Authority
of Ireland



GRAI Annual Report 2025

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Foreword from the Chairperson



The past year has been a formative one for the Gambling Regulatory Authority of Ireland. Appointed by the Minister in March 2025, the Authority was established as a new statutory regulator with responsibility for overseeing a sector of significant scale and social impact.

From the outset, our focus has been on laying the foundations for a new regulatory regime that reflects both the extent of gambling activity in Ireland and the harms that can arise when it is not effectively regulated.

The Authority has been conscious from the beginning that its early decisions would have significance well beyond its first year of operation. The way in which the regulatory framework is shaped, the values that guide decision making, and the standards the Authority sets for itself will all influence public trust in gambling regulation for years to come. As an Authority, we have approached this task with a clear sense of long term purpose and responsibility to the public interest.

Strong governance has been central to this work. Effective structures, policies, and digital systems have been developed to support our regulatory independence, integrity, and effective decision making. Clear arrangements are in place to ensure appropriate oversight, transparency, and accountability in the exercise of statutory powers. Establishing robust structures and policies is fundamental to earning and sustaining confidence in the Authority and in the regulatory regime as a whole.

A key milestone was the adoption of the Authority's first Statement of Strategy for 2025–2027. This Statement provides the framework for the Authority's development and for the phased implementation of the new regulatory regime. It articulates a clear public protection mandate—to ensure that gambling in Ireland is conducted safely, fairly, and transparently—and grounds the Authority's approach in prevention, protection, and evidence based regulation. The Strategy identifies six areas of strategic focus, spanning licensing, monitoring and compliance, enforcement, consumer protection and awareness, organisational capability and governance, and a digital first approach. These priorities provide the basis on which the Authority will be held accountable for the delivery of its statutory functions.

The development of a single national licensing regime represents a fundamental shift in how gambling is regulated in Ireland. For the first time, there is a coherent and comprehensive structure through which expectations of conduct, governance, and consumer protection can be applied consistently across the sector.

This regime is not an end in itself; rather, it is a means of shaping a gambling environment where the public have protections and which supports higher standards across the industry.

Gambling regulation is an increasingly complex task, shaped by digital delivery models, international operations, and evolving patterns of consumer behaviour. The Authority is acutely aware of both the responsibilities conferred on it by the Oireachtas and the challenges inherent in regulating a dynamic and technologically enabled sector. The task ahead is to regulate in a manner that is robust, proportionate, and responsive to risk, while remaining firmly anchored in the protection of individuals, families, and the wider community from gambling related harm.

Ensuring that the Gambling Regulatory Authority is appropriately resourced to discharge its statutory obligations is a matter of fundamental importance. Effective regulation depends not only on legislative powers, but on the capacity to exercise those powers independently, consistently, and over time. As the Gambling Regulation Act 2024 is fully commenced, continued attention to sustainable resourcing will be essential to ensuring that the Regulator can meet its responsibilities to the Oireachtas, to the wider public, and to the licensees within its regulatory remit. The Authority looks forward to working with Minister O'Callaghan and his officials in that regard.

I would like to acknowledge the commitment and professionalism of the Chief Executive, and the staff of the Authority. Their work, and the work of officials of the Department of Justice, Home Affairs and Migration prior to our establishment, has laid the groundwork for a regulator capable of meeting the high expectations placed upon it. As the Authority matures, it will continue to be guided by a strong sense of public purpose and by the trust placed in it by the public.

I would also like to thank Minister Jim O'Callaghan TD and his officials in the Department of Justice, Home Affairs and Migration for their support of the Gambling Regulatory Authority and the work we are undertaking.

Finally, I thank my fellow Authority members for their wise counsel and dedication during the year.

In everything we do, we are conscious of our obligation to the Irish public to ensure gambling activities are well-regulated and fair.

Paul Quinn
Chairperson

Foreword from the CEO



As CEO of the Gambling Regulatory Authority of Ireland (GRAI), I am pleased to report that our first year in operation has been one of momentum and progress as we establish the first regulatory regime for the gambling and gaming sector in Ireland.

Our efforts over the past year have laid the foundation that will guide us toward the future as a trusted, recognised, and effective regulator of the sector, one that puts public health at the centre of all operations.

The Gambling Regulation Act 2024 is one of the most comprehensive pieces of public protection legislation introduced in Dáil Éireann. Our role is threefold: regulate the gambling industry, ensure compliance with legislation designed to protect the public from gambling harm, and improve research and awareness into this area.

The GRAI recognises both the importance of our legislative mandate and of laying the foundations for a regulatory regime that is proportionate, innovative and professional. The most important milestone for both industry and consumers during the past year was the establishment of our licensing regime. In February 2026, we began accepting applications for remote betting licences, remote betting intermediary licences, and in-person betting licences. This was the culmination of extensive research in the previous year, including engagement with operators, to bring forward an online licensing application process that is comprehensive and efficient. Operators were provided with extensive guidance on what would be expected. Teams have been established to assess applications, and ensure that applicants are capable of meeting financial, governance, and consumer protection requirements. In keeping with our digital first approach, an online portal was developed to allow operators to submit their licence application and upload relevant documents online. We expect to begin issuing betting licences from July. Once licensed, operators must meet their obligations under the Act and action will be taken where they fail to do so. This is giving consumers protections that they do not have with unlicensed operators.

From the outset, I have been determined that our work should be grounded in evidence and fact. We have engaged the ESRI to undertake a series of research projects aimed at broadening our understanding of gambling in Ireland. This ongoing research programme has been critical to understanding the motivations of people who gamble and the impact on those for whom gambling becomes a problem. One such study in the past year involved research on Children and Gambling.

We have worked with stakeholders and partners on public awareness campaigns including targeted online advertisements which inform the public about gambling harm while directing them to available supports, and we strengthened our use of LinkedIn, YouTube, and X to communicate more effectively with audiences and raise the Authority's profile.

We have recruited experts across all of our departments, not only in licensing but across IT systems, compliance and consumer protection, and research and education. This has expanded our capacity to move forward, on a phased basis, from licensing of betting activities to begin to stand up regulatory compliance and enforcement regimes.

We continue to foster strong working relationships with international regulatory bodies. Over the course of the year, we signed Memorandums of Understanding with Gambling Regulators in the United Kingdom, Belgium, and Gibraltar. The GRAI looks to counterpart regulators to ensure we design our compliance processes to the standards of international best practice and to foster and embed mutual support, especially in areas such as blackmarket gambling, which transcends borders. In terms of broader stakeholders, we welcome developments by Irish banks including Bank of Ireland, AIB, Revolut, EBS, and PTSB as they introduce voluntary blocks on debit cards for those who wish to reduce or cease their gambling activity. We have partnered with the Advertising Standards Authority to streamline the process for complaints around advertising for gambling.

Looking ahead, the GRAI is moving steadily from initial rollout to sustained delivery. In the coming year we will work to launch the Social Impact Fund, and make funds available as quickly as possible. We will expand the licensing framework to additional areas of gambling, commencing structured compliance activity, engaging in strategic enforcement activity and strengthening operational readiness across all functions will define the next phase of our work. The progress made this year provides a strong base, but our focus remains firmly on delivery and on earning public confidence through consistent, credible regulation.

I would like to recognise the commitment of the staff of the Authority who have worked in demanding circumstances to build a functioning regulator from the ground up. Their expertise, commitment and professionalism have been central to the progress achieved and will continue to shape the culture and effectiveness of the Authority as it develops.

I am also grateful to Minister Jim O'Callaghan and the staff of the Department of Justice, Home Affairs and Migration for their steadfast support this past year.

Finally, I would like to thank the Chair and members of the Authority for their strategic advice, guidance and support throughout the past year.

I look forward to continuing to work with all our stakeholders as the GRAI continues to grow as a regulatory authority. I am confident that the foundations laid are strong, enabling us to continue to build an effective regulator for the gambling sector, which helps to protect an informed public from gambling harms.

Anne Marie Caulfield
CEO

Our Leadership

Authority Members

The Authority of the GRAI is responsible for setting the strategic direction of the organisation. It is comprised of seven members including the Chairperson, who have extensive collective expertise in Finance, Law, Government, Media, Public Health and the Gambling Industry. The Minister for Justice, Home Affairs and Migration appointed the Authority Members following a process conducted by the Public Appointments Service.



Paul Quinn
Chairperson



Celene Craig



Rita Purcell



Marion Kelly



Michael McGrath



David Hickson



Dr. Colin O'Driscoll

2025 Leadership Team

The GRAI's Leadership team is headed up by the Chief Executive Officer and comprises of Directors across a wide breadth of disciplines. The Leadership team plays a critical role in translating the GRAI's strategic objectives into actionable programmes while ensuring compliance, corporate governance, and the delivery of the GRAI's statutory obligations.

GRAI's Executive Team as of December 2025



Anne Marie Caulfield
Chief Executive Officer



Linda Kerr
Director of Licencing



Steven Sheridan
Director of Consumer
Protection and
Communications



Rebecca Coen
Director of Enforcement,
Legal and Anti-Money
Laundering



Michaela McAleer
Director of Compliance
and Complaints



Suzanne Lambe
Director of People &
Corporate Services



Brinsley Sheridan
Director of ICT

2025 Milestones

Quarter 1

- Gambling Regulation Act signed into law
- Establishment of the GRAI
- Minister O'Callaghan appoints GRAI Authority members



- GRAI Authority meets for the first time
- Consultations start in the development of the Social Impact Fund Funding Strategy
- GRAI partners with the Advertising Standards Authority of Ireland

Quarter 2

- Minister O'Callaghan officially opens GRAI offices on Mount Street



- Memorandum of Understanding (MOU) signed with UK Gambling Commission



- Public consultation on licensing opens
- MOU signed with Belgian Gaming Commission



- Anne Marie Caulfield, CEO of GRAI speaks on 'The Problem Gambling Podcast'

- The GRAI welcomes Bank of Ireland's introduction of voluntary blocks on debit cards
- The Social Impact Fund focus groups get underway
- GRAI & the ESRI launch research into gambling inducements
- MOU signed with Gibraltar Gambling Regulator



- Anne Marie Caulfield, CEO of GRAI speaks at the International Association of Gaming Advisors Summit



Quarter 3

- GRAI publishes licensing application guidance
- GRAI welcomes PTSB's introduction of voluntary blocks on debit cards
- GRAI teams up with the Union of Students in Ireland to consult on their student survey incorporating gambling as a topic for the first time



- GRAI attends the Player Protection Conference 2025
- GRAI attends launch of the Common Commitment of Care for Problem Gambling

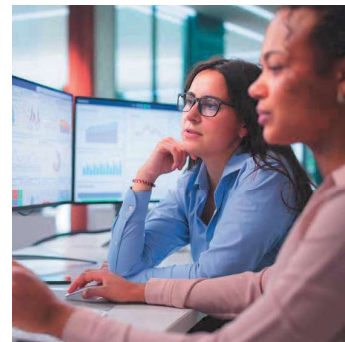
Quarter 4

- Minister O'Callaghan launches GRAI Strategy Statement 2025-2027



- GRAI launches brand awareness campaign
- Anne Marie Caulfield, CEO of GRAI presents at St John of God Research Foundation conference

- Children and Problem Gambling research launched by GRAI and the ESRI
- GRAI hosts webinar with operators to discuss application requirements for Phase 1 of Licensing



Collaboration

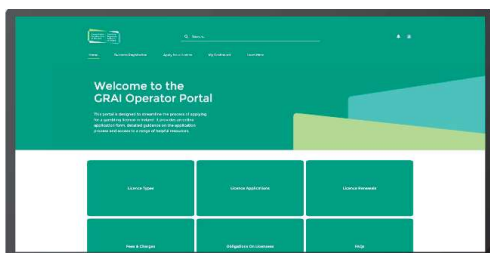
Stakeholder Engagement

As a newly established regulatory body, we recognise the importance of building professional relationships with all stakeholders and developing an environment that fosters trust between the licensees and advocacy groups working in the gambling space and with us as a regulator. During 2025, we met with a wide range of diverse and cross-sectoral stakeholders including;

- Regulatory bodies
- Industry operators
- Public Facing
- Public Bodies
- Advocacy groups and research organisations
- Government Departments

How we engage with our stakeholders

Our website: This is the main source of information for our stakeholders, which contains useful information and guidance on all aspects of our roles and functions.



Our newsletters: These are regularly issued to inform key stakeholders of what is happening in the GRAI, and of advancements in the new regulatory environment, publications, and guidance.

Webinars: A key platform which enabled us to provide key information to operators and to help them prepare for the opening of licensing applications.

Guidance: Publication of guidance, such as FAQ documents, is intended to help operators, and wider stakeholders, to understand regulatory and legal requirements.

Attendance at industry events: Our team shared their knowledge, skills, and experience at industry-wide events throughout the year, including the premier gaming industry event, ICE, and the international Player Protection Conference in The Hague hosted by the Netherlands Gambling Authority. Our team also attended conferences held by gambling support organisations and research bodies.

Memorandums of Understanding: These formalise our working relationships and enable us to do our work more effectively. In 2025, we signed with the Belgian Gambling Commission, the Gibraltarian Gambling Regulator and with the UK Gambling Commission.



Our Regulatory Landscape

The GRAI was established on the 5th March 2025. Under the Gambling Regulation Act 2024, the GRAI has the following functions, which are being rolled out on a phased basis over the period 2025 – 2027:

- 1** (a) to license, supervise and control gambling activities in the State,
 - (b) to establish and maintain—
 - (i) a register of gambling licensees, and
 - (ii) a National Gambling Exclusion Register,
 - (c) to establish, maintain and administer the Social Impact Fund in accordance with [Chapter 4](#) of [Part 2](#),
 - (d) to establish, or cause to be established, standards for certain gambling products or gambling related services, or both, and to certify those products or services for sale or supply by a licensee of a Business to Business gambling licence in accordance with [Chapter 8](#) of [Part 5](#),
 - (e) to impose obligations on licensees and other persons in relation to advertising and branded clothing and merchandise,
 - (f) to impose obligations on licensees including, in accordance with [Part 6](#), in relation to the protection of children, inducements to gamble, the sponsorship of relevant gambling activities, the training of staff, the notification of suspicious gambling patterns (within the meaning of [section 156](#) (1)) and the maintenance of accounts and records,
 - (g) to monitor and enforce compliance by licensees with this Act,
 - (h) to take such enforcement measures, in accordance with [Part 8](#), as are necessary to enforce relevant obligations,
 - (i) to deal with complaints made to the Authority in accordance with [Part 7](#),
 - (j) to take measures to stop prohibited gambling activities in accordance with [Part 4](#),
 - (k) to enhance public awareness and disseminate information to the public in respect of the licensing and regulation of gambling activities,
 - (l) to be a competent authority for the purposes of the Act of 2010,
 - (m) to enter into information sharing arrangements with persons outside the State performing similar functions to the Authority and to enter into information sharing agreements with persons in the State,
 - (n) to engage in research activities in relation to gambling activities,
 - (o) to conduct a review of the operation of this Act from time to time and to report to the Minister on the outcome of the review and, if appropriate, to make recommendations to the Minister following that review,
 - (p) to report to the Minister on the performance of its functions when requested to do so by the Minister, and
 - (q) to cooperate, in relation to the regulation of gambling activities, with the Charities Regulatory Authority, the Competition and Consumer Protection Commission, Coimisiún na Meán and the Revenue Commissioners.
- 2** The Authority shall have all such powers as are necessary or expedient for the performance of its functions.
- 3** Subject to this Act, the Authority shall be independent in the performance of its functions.
- 4** The Authority may require the chief executive to perform functions of the Authority other than functions of the Authority under [Chapter 2](#) of [Part 4](#) or [Chapter 8](#) of [Part 8](#).

Legislation

The Gambling Regulation Act 2024 gives the GRAI our statutory powers.

The legislation is guided by three core principles:

- Making sure that gambling takes place in a fair and safe way.
- That safety measures are in place to address problem gambling.
- Preventing gambling from being a source of or support to crime.

Gambling Sector

The diversity of the Irish gambling sector is illustrated by its broad range of products, a rapidly evolving digital landscape, and a varied demographic of participants. The sector includes a wide array of activities:

- **Lotteries and Scratch Cards:** The most popular form of gambling, with approximately 40% to 56% of the adult population participating.
- **Sports and Racing:** Betting on football, rugby, horse racing, and greyhounds remains a cultural staple, available through both physical bookmakers and online platforms.
- **Gaming and Casinos:** This includes poker, blackjack, roulette, and gaming machines in arcades or private members' clubs.
- **Emerging Digital Products:** Rapid growth has been seen in eSports, virtual games, and social betting features like private betting pools and community forums.
- **Charitable Gambling:** Non-profit organisations run lotteries or bingo for fundraising.

The retail betting sector has seen a steady, commercially driven decline over the last decade, while the remote (online) sector continues to expand.

- **Retail Betting Shops:** The number of physical betting shops fell to 684 at the end of 2025, a significant drop from 1,385 shops in 2008.
- **Remote Operators:** As of February 2026, there are approximately 140–150 active remote bookmaker licenses in Ireland.

- **Gaming Machines:** This is one of the largest segments by volume, with over 9,600 gaming machine licenses issued in recent years following a regulatory crackdown on unlicensed vendors.

The Gambling Regulation Act 2024 has consolidated these numbers into three main license categories managed by the GRAI:

1. **Business-to-Consumer (B2C):** Covers in-person and remote betting, gaming, and lotteries.
2. **Business-to-Business (B2B):** A new requirement for software providers and service companies, ensuring the entire supply chain is vetted.
3. **Charitable/Philanthropic:** For non-profits and sports clubs running fundraising lotteries or bingo.

The industry remains a major economic contributor, employing over 6,000 people and providing roughly €171 million in annual tax revenue to the exchequer. Total gross gambling revenue in Ireland was estimated at €1.17 billion to €2.57 billion in 2025.



Our Mission, Vision & Values

Vision

Our Vision is proportionate, innovative, and professional regulation by which an informed public is protected from gambling harms

Mission

Our Mission is to effectively regulate and educate in order to safeguard current and future generations from gambling harm

Values

Our Values are:

- ▶ Independence
- ▶ Integrity
- ▶ Transparency
- ▶ Innovation
- ▶ Collaboration

Our Strategy

Minister Jim O’Callaghan TD, Minister for Justice, Home Affairs and Migration launched the GRAI’s Strategy Statement 2025 - 2027 in October 2025 alongside Mr Paul Quinn, Chair of the Authority, and Anne Marie Caulfield, CEO of the GRAI.

The Strategy Statement provides an outline of our vision, mission, values, and the key objectives to be achieved over our first three years.

Our Statement of Strategy aligns our purpose to the statutory functions and powers conferred on the GRAI by our governing legislation. It sets out our strategic priorities over the next three years as we establish a robust regulatory and licensing regime for the gambling sector and deliver on our public protection mandate. Our strategy also considers our operational capability and capacity, our people, and technological resources.

This first Strategy Statement provides the GRAI with measurable and attainable goals for the organisation in its early years.

All of the GRAI’s activities are rooted firmly in our functions, powers and strategic objectives as outlined in the Strategy Statement 2025 - 2027.



Our Six Strategic Objectives

**STRATEGIC
GOAL****1****Licensing**

Design and implement an effective, efficient and proportionate licensing regime, for betting, gaming and lotteries, both online and onsite for Business to Customer, Business to Business, Charitable and Philanthropic organisations, all to be licenced, on a phased basis, within the lifetime of this Strategy.

**STRATEGIC
GOAL****2****Monitoring and Compliance**

Establish a comprehensive, robust compliance regime to systematically monitor licensee adherence to their legal obligations in the Act, which reduces the likelihood of gambling harms and underpins a best practice regulated gambling market in Ireland.

**STRATEGIC
GOAL****3****Enforcement**

Develop a robust enforcement framework that enables the Authority to effectively, dissuasively and proportionately address contraventions of the Act and to prevent gambling-related money laundering.

**STRATEGIC
GOAL****4****Consumer Protection and Awareness**

To mitigate and reduce gambling harm through effective research, education, communications and by financial support via the Social Impact Fund.

**STRATEGIC
GOAL****5****People, Organisation and Governance**

Establish a fit-for-purpose organisation with the necessary capabilities, people, skills, and expertise, underpinned by strong governance processes and systems.

**STRATEGIC
GOAL****6****Digital First**

Establish an agile ICT function that supports the Authority business units and our stakeholders, leverages data-analysis and AI to drive compliance with our legislative remit and enables the Authority to effectively regulate a fast-evolving gambling sector.

**STRATEGIC
GOAL****1****Licensing****Overview**

2025 represented the foundational year for the Licensing Directorate, as we focused on establishing the structures, systems, staff and capabilities required to implement a comprehensive gambling licensing regime. In line with the GRAI's Strategy Statement 2025 - 2027, the Directorate prioritised the design and build of a robust, transparent and operationally ready licensing framework.

The Directorate was in a design and readiness phase in 2025 to ensure that all critical components are in place to enable the phased commencement of licensing activities from 2026.

Licensing Framework Development

During 2025, substantial progress was made in developing the policy and regulatory architecture underpinning the licensing regime, including developing detailed plans to support the orderly commencement of B2C betting licensing in 2026.

Key achievements included:

- Design of assessment methodologies covering financial probity, ownership structures, and operational capability
- Development of frameworks for assessment and determination of licence applications
- Establishment of a commencement roadmap for B2C betting licences
- Definition of key milestones, including application opening dates and transition deadlines
- Preparation and publication of supporting guidance

This work establishes a clear and consistent basis for decision-making and ensures that only appropriate and compliant operators may be considered for licensing. It also provides the legal basis for opening for licence applications.

Operational Readiness

Significant progress was made in ensuring that the Directorate is operationally prepared to process licence applications.

Key achievements included:

- Recruitment of specialist staff across technical, legal, and financial assessment functions
- Development of standardised application workflows and procedures
- Establishment of internal assessment and decision-making processes
- Delivery of training to support consistent application of regulatory standards
- Design of a public register of "notice of intent" – those who intend to apply for a licence
- Design of a public register of licensees

These measures ensure that the Directorate is equipped with the necessary expertise and processes to operate effectively at the point of licensing commencement.

Systems and Digital Infrastructure

In line with a "digital-first" approach, the Directorate progressed the development of a centralised licensing system to support application intake, processing, and decision-making.

Key achievements included:

- Development of an end-to-end licensing application portal
- Establishment of internal case management functionality
- Completion of core system build and progression to testing phases

The system is designed to support efficient processing, data-driven oversight, and future integration with compliance and enforcement functions.

Development of Application Fees for B2C Betting & Gaming Licences

During 2025, in conjunction with the Corporate Directorate, the Licensing Directorate inputted to the development of a structured approach to application fees for B2C betting licences, aligned with the GRAI's objective of operating a sustainable regulatory model.

Key achievements included:

- Design of a fee framework for B2C betting and gaming licence applications
- Analysis of licensing cost drivers, including application processing, due diligence, and ongoing regulatory oversight
- Benchmarking against comparable international regulatory regimes
- Development of fee structures proportionate to operator scale

The resulting fee model is intended to ensure cost recovery and maintain proportionality across different types of B2C betting operators.

Stakeholder Engagement and Market Readiness

Engagement with stakeholders was a key priority to support awareness and preparedness across the sector.

Key achievements included:

- Delivery of stakeholder consultations and industry briefings
- Publication of guidance materials outlining licensing requirements
- Communication of anticipated timelines and transition arrangements

These activities have supported early engagement with operators and contributed to improved market readiness ahead of licensing commencement.

Decision-Making Structures

Robust governance arrangements were established to support transparent, consistent, and defensible licensing decisions.

Key achievements included:

- Implementation of formal decision-making frameworks
- Establishment of internal review and escalation processes
- Adoption of governance policies, including conflict-of-interest controls

These structures are critical to maintaining regulatory integrity and confidence in the licensing regime.

Transparency and Public Accountability

Preparatory work was undertaken to support transparency in the operation of the licensing regime.

Key achievements included:

- The public register will be a key mechanism for ensuring accountability and providing visibility to consumers and stakeholders

Conclusion and Future Outlook

Overall, the Licensing Directorate has achieved substantial progress across all planned areas of delivery for 2025. The core licensing framework, supporting systems, structures, and operational capabilities are now in place or at an advanced stage of readiness.

The next phase, commencing in 2026, will focus on:

- Opening of licensing applications
- Processing and assessment of applicants
- Granting of initial licences
- Ongoing refinement of systems and processes based on operational experience
- Development of requirements for next phase of licensing

**STRATEGIC
GOAL****2****Monitoring and Compliance****Overview**

2025 was a busy year for the Compliance and Complaints Directorate as they sought to stand up a comprehensive, robust and proactive compliance regime to coincide with the issuing of the first tranche of licences in July 2026.

2025 Highlights

- Intensive development of the compliance ICT regulatory platform which is due to be completed shortly
- Drafting and development of the Compliance 3-year Strategy & Framework and business plan based on the annual programme of reports, inspections, audits and compliance monitoring activities. This will enable routine system monitoring as well as in-depth large-scale assessments and audits

These projects set out a vision for the Directorate, the levers that will be utilised to effect a cultural change within Ireland's gambling industry. They also set out how the function will be built and the key priorities for the compliance Directorate in years 1-3 and the compliance assessment activities that will be undertaken, the target sample size of licensees and the KPIs that will be monitored.

Comparative Research

An important area of focus was comparative research, in which we examined best practice in gambling compliance and networked with other gambling regulators. This included a visit to the UK Gambling Commission in April, online workshops with Belgium and Gibraltar regulators later in 2025 and regular check ins with regulators in the Netherlands, Denmark and Malta in order to get feedback on processes. We organised a series of in person meetings with other gambling regulators and stakeholders around the Gambling Regulators European Forum Annual Conference in Athens in late May. Meetings are also ongoing with other Irish regulators including the Competition and Consumer Protection Commission (CCPC), Coimisiún na Meán, the Central Bank of Ireland amongst others.

Compliance Framework

The Directorate did a series of research in terms of analysing services available for inspections and audits, and the Directorate supported the publication of guidance documents in terms of the regulatory obligations.

The Directorate also undertook in-depth research into risk models to inform our compliance priorities. We sought input from other regulators on our approach and objectives. The Directorate completed the drafting of the Quarterly Return form for licensees, there has been much focus on the various compliance documents needed including the material events forms.

Complaints

In the area of complaints, extensive workshops, planning and preparation has been undertaken and processes developed in order for the GRAI complaints function to go live by 1 July 2026. Discussions were held with external parties and a large amount of scoping work undertaken in order to ensure best practice. The complaints form will be finalised following internal workshops to embed the form on the GRAI's website. Ease of access, signposting to gambling safety, and user friendliness will be a core focus.

Policy Direction

Much of the Directorate's work has been focus on regulations and presenting Authority papers in relation to regulations for the Authority to approve our proposed policy direction. This involves in-depth research and benchmarking, workshops, and dialogue with legal partners to ensure comprehensive evidence bases are available in a variety of areas to assist the Authority in its deliberations.

Conclusion and Future Outlook

Overall, the Compliance and Complaints Directorate has managed an intense workload and utilised its resources to great effect to ensure the ability of the function to stand up in tandem with the issuing of licences. 2025 was an extremely busy year with much planned for 2026 including:

- Standing up the ICT regulatory platform for compliance and commencing the full suite of compliance procedures
- Implementing the complaints procedures for handling Part 7 Complaints
- Implementing the compliance strategy and framework
- Bringing the licensees on the compliance journey through dialogue, communications, and guidance.

**STRATEGIC
GOAL****3****Enforcement****Overview**

The Enforcement, Legal and Anti-Money Laundering Directorate was established during the reporting period as a core function of the GRAI. In its first year, the Directorate has focused on building the regulatory architecture necessary to deliver an effective, principled and proportionate enforcement function under the Gambling Regulation Act 2024. This has encompassed the development of enforcement principles and policy, workforce and business planning, the design of digital infrastructure, and extensive engagement with domestic and international stakeholders. The Directorate has also worked to prepare the Authority to discharge its responsibilities as a competent authority for the purposes of anti-money laundering legislation when that function is ultimately transferred from the Department of Justice, Home Affairs and Migration.

Strategic Goals and Operational Readiness

The strategic goal of the Directorate is to develop a robust enforcement framework that enables the Authority to effectively, dissuasively and proportionately address contraventions of the Act and to prevent gambling-related money laundering. To that end, detailed business and workforce plans have been prepared to support the phased establishment and expansion of the Directorate's capacity.

Significant progress has been made on legislative implementation. The Directorate has provided legal and policy analysis on a range of complex matters. Arrangements for black market detection and prevention have been advanced. Work on the design of adjudication processes, a key enforcement mechanism under the Act, is substantially complete, supported by specialist external expertise. The Directorate has also worked with the Department of Justice, Home Affairs and Migration on the appointment of adjudicators, appeals officers and the development of appeal processes.

Systems and Digital Infrastructure

The Directorate has prioritised the development of robust digital systems to support enforcement operations. Specialist investigation management tools are being procured.

The Directorate has contributed to the Authority-wide development of a CRM system and has worked with colleagues on the establishment of an information governance framework. A knowledge management system is being built to support the structured capture and retrieval of regulatory intelligence and institutional knowledge.

Anti-Money Laundering

Preparing the Authority to assume its role as a competent authority under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 has been a significant area of focus. The Directorate represents the Authority on the interdepartmental Anti-Money Laundering Steering Committee and has contributed detailed inputs to the National Risk Assessment on Money Laundering, Terrorist Financing and Proliferation Financing.

Close engagement with the Anti-Money Laundering Compliance Unit of the Department of Justice, Home Affairs and Migration has continued throughout the period, with a programme of work underway to support the orderly transfer of the competent authority function.

Stakeholder Engagement

The Directorate has pursued a programme of structured engagement with domestic and international counterparts to inform the design of the Authority's enforcement function and to build collaborative relationships.

At European and international level, the Directorate has participated actively in the Gambling Regulators European Forum, including its enforcement working group, the International Association of Gaming Advisors, and ICE. These engagements have provided valuable insight into regulatory best practice across jurisdictions and have raised the profile of the Authority internationally.

The Directorate has engaged extensively with An Garda Síochána, the Department of Justice, Home Affairs and Migration, and fellow regulators, and is progressing Memoranda of Understanding with a number of bodies including An Garda Síochána. Engagement with industry stakeholders, including the major gambling operators, has been a consistent feature of the period, supporting a collaborative approach to the implementation of the new regulatory framework.

Conclusion and Future Outlook

In the year ahead, the Directorate will focus on recruiting for key positions to support investigative and intelligence gathering and the development of enforcement processes and procedures to underpin enforcement processes, to ensure consistency, transparency and efficiency in enforcement actions. The work of the Directorate will shift from design to operational delivery of the enforcement function. Combatting black market activity, the continued build-out of digital infrastructure, the completion of AML transition arrangements, and the deepening of domestic and international regulatory relationships will remain priorities.

STRATEGIC
GOAL

4

Consumer Protection
and Communications

Overview

Effective stakeholder engagement and communications are vital elements of the GRAI's approach in implementing our regulatory functions and our statutory role in research and educational awareness. In 2025, the Consumer Protection and Communications Directorate delivered a number of communications channels which will serve as the foundation for this work. These included developing a new website and social media channels, introducing a newsletter to keep our diverse stakeholders informed and we supported a range of communications requirements from the various Directorates. A strategic priority for the GRAI is to mitigate and reduce gambling harm through effective research, education, communications. In making steps towards delivering on this objective, we delivered our first major brand awareness campaign and we delivered and supported a number of important research initiatives. We also started the development of the Social Impact Fund, a key consumer protection tool under the legislation.

Social Impact Fund

One of the important new legal obligations to protect the public from gambling harm is the Social Impact Fund. The fund will support harmful gambling education and awareness programmes, finance research into harmful gambling and fund measures to treat and address gambling harms.

The contribution rate will be determined by the Minister for Justice, Home Affairs and Migration Jim O'Callaghan TD. During 2025, the GRAI developed a proposal for the contribution projections model for the fund which was based on sector turnover levels and informed by consultation with other regulators. The GRAI also commissioned an independent review by Indecon Economic Consultant of this proposal before it was submitted to the Minister for consideration.

A core priority for the GRAI is to ensure that funding under the Social Impact Fund is made available as soon as the relevant legislation and commencement orders are in place. In 2025, we partnered with Pobal to assist with the design and administration of the fund. Together we undertook a significant amount of stakeholder engagement, consultation and market research with current providers in the area, lived experience individuals, the HSE, the Health Research Board and the Department of Justice, Home Affairs and Migration to assist in the development of the Social Impact Funding Strategy. The strategy sets out clear objectives and goals for the Social Impact Fund.

Research

Protecting the public interest and society, in particular minors, from gambling harms is a core function of the GRAI. Building an evidence base is critical in achieving this in order to inform our approach to regulation, policy development and to ensure the public has the most up to date, relevant and accessible information relating to gambling harm and addiction.

In 2025 we:

- Established a research working group and hosted quarterly meetings which consisted of representatives from; the Health Research Board (HRB), the Economic and Social Research Institute (ESRI), and the All Island Institute of Public Health (IPH).
- Partnered with the ESRI to deliver a report entitled 'Effects of inducements on sports gambling and decision-errors: A study' which found that inducements such as free bets and moneyback guarantees increased spending by over 10 per cent in an experimental setting and reduced the number of people choosing not to bet. The study was published in an international peer-reviewed journal.
- We welcomed the opportunity to contribute to research carried out by AMLÉ (Aontas na Mac Léinn in Éirinn) on the prevalence and characteristics of gambling activity among students in order to help inform campaigns and policy at a national level.

Public Awareness Campaign

In October 2025, the Consumer Protection & Communications Directorate launched the first major GRAI brand awareness campaign. The campaign, which commenced in October 2025, supported the GRAI's brand introduction with a multi-channel media strategy spanning programmatic display, online video, and a targeted video activation concentrating on niche broadcast sports programming. The campaign was based on GRAI commissioned ESRI research highlighting the prevalence of problem gambling in Ireland and consisted of commercials individually tailored to target men, women, and teenagers and included a dedicated Gaeilge creative version. The campaign was extremely successful and across all channels delivering 13.31 million impressions and 277,244 clicks.

Conclusion and Future Outlook

In 2025, the Consumer Protection and Communications Directorate made significant strides in establishing the communications and stakeholder engagement foundations for the organisation and in laying the groundwork for the strategic objective of the unit, to mitigate and reduce gambling harm. A key focus for the year ahead will be building on these foundations to educate and inform the public not just of our regulatory functions, but also to protect and inform the most vulnerable in society around the harms of problem gambling.

STRATEGIC
GOAL

5

People, Organisation
and Governance

Overview

The Chief Executive is responsible for the day-to-day management and administration of the GRAI. Our initial focus was on the building and implementing a robust licensing regime for the gambling sector, the regulatory framework, and communicating with key stakeholders about the new regulatory authority.

We have introduced a significant number of policies and procedures, governance structures, developed operations, appointed new staff and we have sought to ensure that the GRAI has appropriate resourcing both human and financial.

The operational environment continues to evolve, as we move into the delivery phase of some of our regulatory functions throughout 2026.

Staffing

The GRAI is currently a small but dynamic organisation, where the ethos is one of integrity and ensuring consistent and effective decision-making. Whilst we are still a new organisation, a key focus has been staff development and continuous improvement. The GRAI requires a combination of specialist expertise, decision-makers, case managers and administrators and we endeavour to ensure we have the appropriate skills and expertise at all levels of the organisation and that these resources are utilised in the most effective and efficient way.

The GRAI, in conjunction with Ernst and Young, commissioned a workforce plan to reflect recent changes in the gambling sector, the labour market, the rise of technology, the increase in online/remote gambling and the adoption of AI, all of which indicated a re-evaluation of the proposed workforce. To address this need, a three-year strategic workforce planning review was undertaken. The goal of this review was to ensure that the GRAI's workforce is properly structured, resourced, and equipped to meet the evolving gambling landscape, fulfil legislative requirements, and achieve the GRAI's strategic objectives over the next three years. The recommendations for a concerted increase in staff recruitment are in line with the GRAI's broad 3-year operating plan: Establishment (2025), Operationalisation (2026), and Business As Usual (BAU) (2027).

As the GRAI moves towards a business-as-usual environment, we will require increased human resources, to manage registration, evaluation, education, guidance, monitoring and compliance, concerns, and legal.

We will continue to regularly review our staffing requirements to ensure they are properly aligned to our deliverables and objectives. As of 31 December 2025, the GRAI had 28 full time employee staff in post.

Staff development

The GRAI has a focus on staff development and becoming an employer of choice in line with our strategic objectives. We have actioned several key deliverables throughout the past 10 months, including monthly all-staff meetings, internal training programmes, support for external training courses and attendance of staff at gambling related conferences and events.

Premises

In April 2025, The GRAI secured new office accommodation in Dublin City Centre, providing an enhanced working environment, and enabling growth of our workforce to ensure delivery of our objectives.

SEAI Requirements

The GRAI is aware of its obligations regarding energy reporting and will begin this in 2026 once an energy efficiency baseline has been established. We will communicate how the organisation aims to meet the requirements of the Public Sector Climate Action Mandate through our Action Roadmap as well as reporting on our compliance with Circular 1/2020 (Procedures for offsetting the emissions associated with official air travel).

Freedom of Information (FOI)
Requests

The GRAI is implementing an FOI publication scheme, as required by Section 8 of the Freedom of Information Act, which will be accessed on our website. 7 FOI requests were received in 2025. 1 was fully granted, 1 was partially granted, 4 were refused and 1 was withdrawn, all following evaluation against the Act.

In 2025, the GRAI did not receive any FOI internal review requests. Additionally, no applications for review were submitted to the OIC concerning GRAI FOI decisions.

Data Breaches

One minor data breach occurred during 2025 and was recorded as low risk. It was however reported to the Data Protection Commissioner. The GRAI currently procures outsourced Data Protection Services from Ernst & Young.

No investigations were initiated by the Data Protection Commission(DPC) in relation to the General Data Protection Regulations (GDPR) and the GRAI in 2025. The DPC also received no complaints concerning GRAI during this period.

Official Languages Act Compliance

The GRAI is committed to adhering to the Official Languages Act 2003. In line with Section 4B of the Official Languages (Amendment) Act ,2021, the GRAI has appointed a senior employee to oversee compliance with its statutory language obligations.

Parliamentary Questions

The GRAI received and responded to 46 parliamentary questions in 2025. The regulator has a designated email address for TDs and Senators in order to streamline the process.

Subject Access Requests

In 2025, the GRAI did not receive any Subject Access Requests (SARs) under the General Data Protection Regulation (GDPR). The GRAI remains committed to upholding the rights of individuals to access their personal data and established procedures to handle SARs promptly and in full compliance with GDPR requirements.

The GRAI did not receive any requests for erasure, rectification or restriction under GDPR during 2025.

Protected Disclosures

As a public body, the GRAI is required under section 22 of the Protected Disclosures Act 2014, to publish an annual report in relation to the number of protected disclosures made to it in the preceding year, and the action taken in response to any such protected disclosures. No protected disclosures were made to the GRAI in the period 5 March to 31 December 2025.

Conclusion and Future Outlook

2025 was an extremely busy year for the Directorate, with ongoing recruitment, policy and procedures development and governance requirements forming some of the main issues. 2026 will see a continuing emphasis on staff expansion as well as maintaining the efforts to embed a robust governance and compliance framework throughout the organisation. Some of the key goals are as follows:

- Staffing complement significantly expanded
- All mandatory compliance goals achieved
- Staff trained in relevant internal policies
- Successful internal and external audits
- Publication of 2025 GRAI Annual Report

**STRATEGIC
GOAL****6****Digital First****Overview**

The GRAI Strategy Statement 2025 - 2027 includes a goal to establish an agile ICT function that supports the Authority business units and its stakeholders, leverages data-analysis and AI to drive compliance with its legislative remit and enables the Authority to effectively regulate a fast-evolving gambling sector.

Establishment

Following a keen public procurement, facilitated by the Competitive Dialogue process, a successful bidder was chosen towards the end of 2024 to implement all regulatory systems for the GRAI. The successful bidder was Deloitte Ireland and the platform for delivery of regulatory systems was Salesforce – namely the Public Sector Solutions (PSS) product which sits on Salesforce's Service Cloud. The Secretary General of the Department of Justice, Home Affairs and Migration signed the contract in February 2025. This services contract was worth €10.4 million to deliver on functionality required within Licencing, Compliance, Enforcement and the National Gambling Exclusion Register (NGER).

In order to facilitate our establishment in March 2025, our office premises move and our extraction from the Department of Justice, Home Affairs and Migration ICT systems, it was decided to partner with the Office of the Government Chief Information Officer (OGCIO), Build to Share (BTS) team in the delivery of all local infrastructure in Ballaugh House. This included networking hardware, laptops, desktop computers, mobile devices and all software and ancillary systems required for their safe connection to government networks and the internet.

The Digital First strategy in this establishment phase was two pronged, namely progressing on an agreed Regulatory Platform (SalesForce) while utilising OGCIo BTS delivered office automation systems (Microsoft Office, eDOCS and associated tooling). This approach allowed us to concentrate our limited resources on the Regulatory Platform while leveraging the OGCIo to look after all infrastructure and office automation requirements.

The business imperative was to deliver Licensing functionality first, followed by Compliance, NGER and Enforcement. The procurement process carried out preceded the final version of the Act and made a best but informed guess at what the functionality requirement was for Licencing and the NGER while not containing any mapped-out requirement for Compliance and Enforcement. This allowed for clarity on costings for the former with a fixed price mandated for the latter based on the bid cost for Licencing. This meant that the base licensing product could be delivered to a tight timeline of 16 weeks. The initial licencing release was delivered on time and on budget in July 2025. As the Act was not commenced at this time, and skilled Subject Matter Experts (SMEs) were now recruited, it was decided to begin work on an enhanced version of the licensing product and this was delivered in December 2025 with a view to go live in early 2026.

GRAI Website and CRM

In parallel with the above, another procurement process resulted in the appointment of a website development vendor to deliver our public facing website, www.grai.ie. The new branding and presence were delivered in time for establishment in March 2025. The successful vendor was Ember Technology Ltd. who also delivered the necessary integrations from the public facing website to our Salesforce Regulatory Platform later in the year facilitating a channel into core Customer Relationship Management (CRM) functionality.

In December, we went live with our CRM solution where we leveraged the mostly out of the box functionality within the Salesforce Service Cloud to allow thorough management of communications from stakeholders. This system initially allowed for communications via a webform on our www.grai.ie public facing website and email with other channels being included later. This system allows the close management of all stakeholder communications including escalation functionality with dashboards and reports included to allow informed management and high-quality presentation of data.

Governance and Security

Through this early startup phase a comprehensive governance model was developed, approved and adhered to, it includes as appropriate; the Director of Technology/Digital First, Change Advisory Board (a sub-group of the SMT), Senior Management Team (SMT), ICT Steering Committee (ICTSC) and Authority. In parallel channels are kept open to the Department of Justice, Home Affairs and Migration via a Peer Review Group (PRG). A monthly summary report of ICT progress is also sent to the Project Management Office (PMO) in the Department of Justice, Home Affairs and Migration.

Of paramount importance in this early startup phase is a “secure by design” mindset. The GRAI will be holding Personally Identifiable Information (PII) in several of its systems. All GRAI systems are designed with this mindset and there was oversight in this regard from members of the ICT Steering Committee. In December a detailed and comprehensive desk-based audit, as well as the implementation of an across-the-board penetration test was completed. These resulted in a very positive and clear indication that our security posture was secure to best practice.

Conclusion and Future Outlook

2025 was a very successful year for the ICT function of the GRAI. All systems required were delivered in line with the business need and an agreed roadmap was concluded at Authority level to continue to deliver high quality, secure and performant systems to a clearly defined timeline with dependencies built in.

Targets for 2026 include:

- Go live of Regulatory Platform V1.1.
- Completion of Regulatory Platform V2 in June – Compliance heavy deliverable but will have enhancements to Licensing and limited Enforcement improvements.
- Development of National Gambling Exclusion Register Operator back end by end Q4 2026.
- Document/Record Management system with correct data retention introduced to all business areas (eDOCS) including Intranet.
- Operationalisation of Information Governance Framework – to include CyberSecurity, Data Protection & Privacy, Record Management etc.

Governance

Our corporate governance arrangements are determined by our governing legislation and the Code of Practice for the Governance of State Bodies. Additionally, the relationship with the Department of Justice, Home Affairs and Migration is governed by a Corporate Governance Assurance Agreement. Our governance arrangements are reviewed annually to ensure compliance with our statutory obligations and continuous adherence to best practice.

The Authority members met on 11 occasions from 5 March 2025 to 31 December 2025.

Board Member	Meetings Attended
Paul Quinn (Chairperson)	11
Celene Craig	10
Marion Kelly	9
Rita Purcell	8
David Hickson	11
Michael McGrath	11
Colin O'Driscoll	11

Subcommittees

Audit and Risk Committee

The GRAI established an Audit and Risk Committee (ARC) which comprises two Authority members and three external members one of whom is the Chairperson. The role of the ARC is to support the board in relation to its responsibilities in matters relating to risk, internal control and associated assurance. The ARC is independent from the day-to-day financial management of the organisation.

There were three meetings of the ARC in the period to December 2025.

ICT Steering Committee

The GRAI established an ICT Steering Committee in May 2025. The role of the Committee is to provide advice and guidance on the strategic direction for IT-related projects, contribute to GRAI's ICT Strategy & Priorities and Governance and Advisory to support these projects and initiatives. There were six meetings held in the period to December 2025.

Governance and Financial Reporting

The GRAI is committed to attaining the highest standard of corporate governance within the organisation. The overall governance and control framework within the GRAI is guided by compliance with the Gambling Regulation Act 2024 and the provisions of the Code of Practice for the Governance of State Bodies (2016).

Internally produced financial reports showing details of expenditure against the agreed budget were reviewed by the Audit & Risk Committee and the Authority on a regular basis throughout the year. In line with the Code of Governance for State Bodies 2016, the Authority prepared and submitted this Annual Report and draft

financial accounts for 2025 to our parent department and the Comptroller and Auditor General noting they are a true and fair view of the GRAI's financial performance and financial position from 5th March to 31st December 2025. These Financial Statements have been prepared under FRS102, the Financial Reporting Standard applicable to the UK and Ireland issued by the Financial Reporting Council (FRC). GRAI will submit the approved financial accounts for 2025 to the Minister in due course.

Risk Management

The GRAI has implemented a risk management framework which includes a Risk Management Policy and Procedure and a Corporate Risk Register. The risk management system identifies and reports key risks and the management actions being taken to address and, to the extent possible, mitigate those risks.

The risk register which identifies the key risks facing the GRAI is in place. Risks have been identified, evaluated and graded according to their significance. The register is reviewed and updated by the ARC on a quarterly basis. The outcome of risk reviews is used to plan and allocate resources to ensure risks are managed to an acceptable level. Risk is a standing agenda item at all board meetings. As of end December 2025, the following are the top 4 risks to the organisation:

1. Staffing
2. Legislative issues
3. Budget issues
4. Licensing timelines

Procurement

The GRAI has developed procedures to comply with current procurement rules and guidelines as set out by the Office of Government Procurement. The GRAI adhered to the relevant aspects of the Public Spending Code.

Internal Audit

The GRAI has established its internal audit function, in compliance with the Code of Practice for the Governance of State Bodies. The internal audit function is managed through an external provider. The GRAI has introduced an audit charter and internal audit strategy (2025 - 2027). The first internal audit, which covered a review of the effectiveness of the system of internal controls, took place in February 2026 and forms part of the assurance system reported in this Annual Report.

Delegations

There were no delegations completed in 2025.



Údarás Rialála
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na hÉireann

Gambling
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